

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

SARAH,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE NO.: 1:23-cv-00223

HON. HALA Y. JARBOU

****EXPEDITED CONSIDERATION REQUESTED****

**DEFENDANTS JAMES JACKSON AND LUCAS JACKSON MOTION TO FOR LEAVE TO
EXCEED L.Civ. R. 7.3 WORD AND PAGE LIMIT REQUIREMENTS**

NOW COMES Defendant James Jackson and Defendant Lucas Jackson (hereafter the Jackson Defendants”) and do hereby motion this Court for leave to exceed the word and page limit restrictions as set forth in Loc. R. Civ. Pro. 7.3 and so state:

1. The Defendants are filing a Motion to Dismiss Pursuant to Fed. R. Civ.P. 12(b)(2),(b)(3),(b)(5), or in the Alternate, to Dismiss or Transfer Pursuant to 28 USCA §1404(a) and brief in support.

2. The deadline for filing their responses is today, March 31, 2023.

3. The Defendants could divide their requested relief into two separate motions and briefs, with one as a Motion to Dismiss under Fed. R. Civ. P. 12(b)(2); (b)(3), and (b)(6), and the other as a Motion to Dismiss or Transfer under 28 USCA§1404(a). However, the facts and legal issues regarding jurisdiction and venue are tied together.

4. In the interests of efficiency and conservation of the issues, Defendants ask that this Court allow them to file their Brief, which is attached as **Exhibit A**, and which addresses their challenges to jurisdiction and venue in one responsive pleading.

5. The Brief is 7,548 words, which exceeds this Court's limits by 3,248 words.

6. The Brief is 22 pages long, which exceeds this Court's limit by 12 pages.

7. Defendants have not sought the concurrence of Plaintiff's counsel due to time limits as their response is due today.

WHEREFORE, Defendants pray that this Court enter the Order attached as **Exhibit B** and grant this motion and allow them to file the attached Motion and Brief without further delay or, in the alternate, grant them additional time to file their response so that they can conform their response to the Court's word and page limits.

Respectfully submitted,

Dated: March 31, 2023

Bolhouse, Hofstee & McLean, P.C.

By: /s/ Michelle M. McLean
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Attorneys for Defendants James Jackson and Lucas Jackson